

On behalf of The Findlay Publishing Company (WFIN-AM / WKXA-FM, Findlay, Ohio; WRBI-FM, Batesville, Indiana; WCSI-AM / WKKG-FM / WINN-FM, Columbus, Indiana; WWWY-FM, North Vernon, Indiana), I wish to express my disbelief over your proposal to expect broadcasters to record and archive 112 hours of programming weekly.  
Why...?

There is absolutely no basis to cause undue hardship (both labor and financial) to small-market broadcasters, who historically, are the most observant in providing local, clean programming.

In fact, we actually promote our stations as the "clean alternative."

Admittedly, there are some large broadcast companies that have decided that obscene and offensive programming delivers ratings and that equals revenue. Wall Street is all about revenue and meeting expectations.

...now another righteous attempt, on the part of the FCC, to require broadcaster's to invest capital in equipment to capture programming...seems more about show than substance.

Why not place the burden on those broadcasters who you are targeting with this effort...?

We take our responsibility very serious. We reflect the needs and interests of the communities in which we are proud to serve and would ask that the FCC not overburden us with this unnecessary, laborious task.

Talk to those who continuously, ignore the FCC and let them record their programs for you to review.

David P. Glass  
VP / Broadcast  
The Findlay Publishing Company

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